

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

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MARY PHILLIPA SLEDGE, MARY  
JANE PIDGEON SLEDGE TRUST, and  
PIDGEON SLEDGE FAMILY LIMITED  
PARTNERSHIP,

Plaintiffs,

v.

Case No. 2:13-cv-2578-STA-cgc

INDICO SYSTEM RESOURCES, INC. and  
CLEAL WATTS, III,

Defendants.

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**PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

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COME NOW, Mary Phillipa Sledge, Mary Jane Pidgeon Sledge Trust, and Pidgeon Sledge Family Limited Partnership ("Plaintiffs"), by and through counsel, pursuant to FED. R. CIV. P. Rule 56, and move this Court for Summary Judgment against Indico System Resources, Inc. and Cleal Watts, III ("Defendants"). In support of this motion, Plaintiffs incorporate herein and reference their contemporaneously filed Memorandum of Law in Support hereof, as well as their Statement of Undisputed Material Facts.

In sum, Plaintiffs move this Court for an award of damages in the amount of \$22,232,700 (which amount includes invested amounts, prejudgment interest and trebled damages) plus a reasonable attorney's fee, as well as findings of fact and conclusions of law as set forth in the accompanying memorandum.

Respectfully Submitted,

/s/ Darrell N. Phillips

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 8th day of January 2015, a copy of the foregoing electronically submitted document was served on the parties listed below via first class mail, postage prepaid, unless said party is a registered CM/ECF participant who has consented to electronic notice, and the Notice of Electronic Filing indicates that Notice was electronically mailed to said party.

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/s/ Darrell N. Phillips